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June 4, 2025

VIA ELECTRONIC FILING

Judge Mislav Lovric
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, NY 13901

Re: Stanley Zhong, et al. v Cornell University
3:25-cv-00365-ECC-ML

Dear Judge Lovric:

I have appeared in this matter as co-counsel for Defendants Cornell University and Michael Kotlikoff.

I write to respectfully request:

- (1) An extension of time for the Defendants to answer or move to dismiss the Plaintiffs' Complaint until July 16, 2025. The action was commenced on March 22, 2025, and Defendants' response to the Complaint is currently due on June 16, 2025; and
- (2) That the Court adjourn the initial conference scheduled for June 25, 2025.

I request the extension because I have only recently been retained as co-counsel for Defendants, and require time to prepare properly a motion to dismiss.

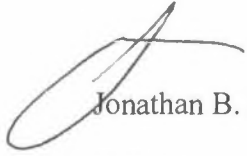
My co-counsel, Adam Gregory Pence, spoke with the Plaintiffs, who are *pro se*, on June 3, 2025, and they agreed to the requested extension as well as the adjournment of the initial conference. Attorney Pence confirmed the conversation in an email to the Plaintiffs (a copy is enclosed).

We also note that during the conversation with Attorney Pence, Plaintiffs asked if Cornell had any objection to their request for permission to file documents on the Court's e-filing system. Docket No. 8. We confirm that Defendants have no objection to the Plaintiffs being allowed to file documents on the Court's ECF system.

Respectfully,

Judge Mislav Lovric
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BOND, SCHOENECK & KING, PLLC



Jonathan B. Fellows

JBf/slp
Enclosures

Cc via Email & First-Class U.S. Mail:

Stanley Zhong
211 Hope St.
#390755
Mountain View, CA 94039
Pro se Plaintiff
Stanleyzhong05@gmail.com

Nan Zhong
211 Hope St.
#390755
Mountain View, CA 94039
nanzhong1@gmail.com
Pro se Plaintiff

CC via ECF :
Adam Pence, Esq.

From: Adam Gregory Pence <agp88@cornell.edu>
Sent: Tuesday, June 03, 2025 5:04 PM
To: Nan Zhong <nanzhong1@gmail.com>; Stanley Zhong <stanleyzhong05@gmail.com>
Subject: RE: Zhong et al v. Cornell University et al (3:25-cv-00365-ECC-ML)

External Email: Use caution before clicking links or opening attachments.

Nan and Stanley:

Thank you for the call today. I am confirming our discussion – i.e., that Cornell will submit a request to the Court on consent seeking an adjournment of the university’s deadline to respond to the Complaint until July 16 (30 days after the current deadline). We will also ask Magistrate Lovric to adjourn the upcoming initial conference, given Cornell’s intent to file a motion to dismiss and Plaintiffs’ intent to amend the Complaint.

In terms of your motion for access to e-filing, Cornell does not oppose your request.

Adam

From: Nan Zhong <nanzhong1@gmail.com>
Sent: Monday, June 2, 2025 5:59 PM
To: Stanley Zhong <stanleyzhong05@gmail.com>
Cc: Adam Gregory Pence <agp88@cornell.edu>
Subject: Re: Zhong et al v. Cornell University et al (3:25-cv-00365-ECC-ML)

Adam, in case of technical difficulties, please call me at 425-698-9139.

On Mon, Jun 2, 2025 at 9:35 AM Nan Zhong <nanzhong1@gmail.com> wrote:

I sent a calendar invite for 3pm ET tomorrow (Tuesday). The meeting link is
<https://meet.google.com/csy-rbzd-nbb>

On Mon, Jun 2, 2025 at 8:49 AM Stanley Zhong <stanleyzhong05@gmail.com> wrote:

Yes, I am available between 3 and 4pm Eastern on Tuesday and Wednesday, though I would prefer Tuesday if possible.

Best,
Stanley

On Mon, Jun 2, 2025, 8:31 AM Nan Zhong <nanzhong1@gmail.com> wrote:

I am available between 3pm and 4pm (ET) tomorrow and Wednesday.

Stanley, can you confirm your availability tomorrow or Wednesday?

On Mon, Jun 2, 2025 at 5:41 AM Adam Gregory Pence <agp88@cornell.edu> wrote:

Nan:

All parties will need to be present. I am not available this afternoon, unfortunately. I can be available between 3-5 tomorrow or 3-5 Wednesday though. Do either of those windows work?

Adam

From: Nan Zhong <nanzhong1@gmail.com>
Sent: Saturday, May 31, 2025 11:20 PM
To: Adam Gregory Pence <agp88@cornell.edu>
Cc: Stanley Zhong <stanleyzhong05@gmail.com>
Subject: Re: Zhong et al v. Cornell University et al (3:25-cv-00365-ECC-ML)

Hi Adam,

I am available pretty much anytime this coming Monday (June 2). If both Stanley and I need to be there, both of us are generally available between 3pm and 4pm (ET).

Thanks,

Nan

On Fri, May 30, 2025 at 10:51 AM Adam Gregory Pence <agp88@cornell.edu> wrote:

Mr. Zhong:

Thank you for your e-mail. I will check my schedule and circle back with you early next week on this issue. Have a good weekend.

Adam

From: Nan Zhong <nanzhong1@gmail.com>
Sent: Thursday, May 29, 2025 3:50 PM
To: Adam Gregory Pence <agp88@cornell.edu>
Cc: Stanley Zhong <stanleyzhong05@gmail.com>
Subject: Zhong et al v. Cornell University et al (3:25-cv-00365-ECC-ML)

Hi Adam,

We acknowledge receipt of your Notice of Appearance filed on May 21, 2025, in the matter of Zhong et al. v. Cornell University, Case No. 3:25-cv-00365-ECC-ML.

We are writing to inquire if you would like to schedule a meet and confer to discuss the University's anticipated responsive pleading to our Complaint and any other preliminary matters, in accordance with the applicable court rules.

If so, please let me know your general availability or propose some dates and times that work for your team. For scheduling purposes, please note that we are located in California (PDT).

We look forward to hearing from you.

Best regards,
Nan
Plaintiffs, Pro Se